



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard J. Fox, Treasurer
Wisconsin Right to Life Political
Action Committee
10625 W North Avenue
Milwaukee, WI 53226

JUN 13 2001

Identification Number: C00173278

Reference: Year End Report (11/28/00-12/31/00)

Dear Mr. Fox:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a \$1,500 payment to your connected organization for rental list fee for 2000 elections (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) to another political committee(s) for goods and/or services provided by that committee(s). 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for

goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee was assessed the usual and normal charge for the goods and/or services you received and explain the steps the political committee(s) took in determining the amount(s) charged to you. If your committee was provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by the political committee(s) to your committee and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-On Schedule E supporting Line 24 of your report, you disclose disbursements to Western Union and Instant Mailing Service for "automated general election phone calls in 11/00" and "mailing of general election (11/00) reporter", respectively. Please provide the specific dates on which these Independent Expenditures were made.

-The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, purpose of the expenditure, date of payment, amount of payment, the name and office sought of the federal candidate supported or opposed, signature of the treasurer, and notarized certification of the information provided. Please amend Schedule E by providing the name and office sought of the federal candidate and an indication of support or opposition to that federal candidate. 11 CFR §104.3(b)(3)(vii)

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Walker", is positioned above the printed name.

Scott Walker
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
21.6.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in FUB)

WISCONSIN RIGHT TO LIFE PAC

A. Full Name, Mailing Address and ZIP Code

ASSOCIATED BANK
P.O. Box 19097
GREEN BAY, WI. 54307-9097Purpose of Disbursement
BANK INTEREST INCOME
LESS SERVICE CHARGESDisbursement for: ☐ Primary ☐ General
☒ Other (specify) BANK CHARGESDate (month,
day, year)

11/28/00

Amount of Each
Disbursement This Period

<465.59>

B. Full Name, Mailing Address and ZIP Code

ASSOCIATED BANK
P.O. Box 19097
GREEN BAY, WI. 54307-9097Purpose of Disbursement
REFUND OF PREVIOUS
BANK SERVICE CHARGESDisbursement for: ☐ Primary ☐ General
☒ Other (specify) BANK SERVICE CHARGESDate (month,
day, year)

11/28/00

Amount of Each
Disbursement This Period

<780.50>

C. Full Name, Mailing Address and ZIP Code

NEUMANN FOR U.S. SENATE
SCOTT BEANS, TREASURER
P.O. Box 190, PEWAUKEE, WI. 53072Purpose of Disbursement
PURCHASE OF LIST FOR
TELEMARKETING FUNDRAISINGDisbursement for: ☐ Primary ☐ General
☒ Other (specify) FUNDRAISINGDate (month,
day, year)

12/8/00

Amount of Each
Disbursement This Period

2,304.16

D. Full Name, Mailing Address and ZIP Code

WRTL - GENERAL FUND
10625 W. NORTH AVE.
MILWAUKEE, WI. 53226Purpose of Disbursement
RENTAL LIST FEE FOR
2000 ELECTIONDisbursement for: ☐ Primary ☐ General
☒ Other (specify) RENTAL LISTDate (month,
day, year)

12/15/00

Amount of Each
Disbursement This Period

\$1,500.00

E. Full Name, Mailing Address and ZIP Code

M.S.P. MAILING SERVICE
4950 SOUTH GAY STREET
MILWAUKEE, WI. 5Purpose of Disbursement
MAILING OF DIRECT
MAIL FUNDRAISERDisbursement for: ☐ Primary ☐ General
☒ Other (specify) FUNDRAISINGDate (month,
day, year)

12/18/00

Amount of Each
Disbursement This Period

\$7,490.24

F. Full Name, Mailing Address and ZIP Code

WRTL - EDUCATION FUND
10625 W. NORTH AVE
MILWAUKEE, WI. 53226Purpose of Disbursement
UPS POSTAGE USAGE
FOR NOV '00Disbursement for: ☐ Primary ☐ General
☒ Other (specify) POSTAGE ADMINDate (month,
day, year)

12/20/00

Amount of Each
Disbursement This Period

\$51.03

G. Full Name, Mailing Address and ZIP Code

WRTL - GENERAL FUND
10625 W. NORTH AVE
MILWAUKEE, WI. 53226Purpose of Disbursement
GENERAL POSTAGE
USAGE FOR NOV '00Disbursement for: ☐ Primary ☐ General
☒ Other (specify) POSTAGE ADMINDate (month,
day, year)

12/20/00

Amount of Each
Disbursement This Period

\$127.38

H. Full Name, Mailing Address and ZIP Code

FEDERAL ELECTION COMMISSION
P.O. Box 952182
ST. LOUIS, MO. 63195-2182Purpose of Disbursement
PROPERTY FOR REPORT
DELAYSDisbursement for: ☐ Primary ☐ General
☒ Other (specify) ADMIN. FEESDate (month,
day, year)

12/31/00

Amount of Each
Disbursement This Period

\$850.00

I. Full Name, Mailing Address and ZIP Code

ASSOCIATED BANK
P.O. Box 19097
GREEN BAY, WI. 54307-9097Purpose of Disbursement
BANK INTEREST INCOME
THRU 12/31/00Disbursement for: ☐ Primary ☐ General
☒ Other (specify) BANK CHARGESDate (month,
day, year)

12/31/00

Amount of Each
Disbursement This Period

<189.92>

SUBTOTAL of Disbursements This Page (optional)

\$10,886.80

TOTAL This Period (last page this line number only)

\$10,886.80

